

258 Main Road  
Montgomery, MA 01085

July 14, 2006

Robert Sydney  
General Counsel  
Division of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

**RE: Public Comment on Proposed Revisions to Renewable Energy Portfolio  
Standard (225 CMR 14.00)**

Dear Attorney Sydney:

I am horrified to learn that there is a serious proposal to burn Construction and Demolition (C&D) waste in Massachusetts. This must not be allowed to go forward.

I am a registered professional environmental engineer with over 20 years of experience, with an M.S. in Environmental Engineering and a Ph.D. in Civil Engineering. My career has focused on assessing and remediating environmental contamination. I am well aware of the toxic chemicals present in treated and painted wood, and have worked on several Superfund sites where wood-treating operations caused severe contamination. Treated wood can contain arsenic, cadmium, chromium, creosote, pentachlorophenol, and other hazardous chemicals. Painted wood can contain lead and other heavy metals. C&D waste contains some of the most toxic chemicals that exist and cannot be burned safely. For one thing, metals – being elements – will not break down in the burning process.

New Hampshire has had trouble from burning C&D waste, resulting in some of the worst air quality in the country. Given the experience of this neighboring state, it would be extreme folly to make the same mistake.

I am also concerned about the quiet way this has been proposed, and there appears to be a lack of communication and due process. Even a friend of mine who works in solid waste disposal in Massachusetts, and tracks such information, had not heard of this crazy proposal until yesterday.

Please, this is a serious public health threat, and no matter what the economic and political factors may be that would favor such a move, burning C&D waste should not be allowed in Massachusetts.

Sincerely,

A handwritten signature in blue ink that reads "Ellen Moyer". The signature is fluid and cursive, with the first name "Ellen" and last name "Moyer" clearly distinguishable.

Ellen E. Moyer, Ph.D., P.E